

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA**

IN THE MATTER OF:

WILLIAM RAYMOND BRYAN

SSN: ###-##-5015

) **BK. NO. 20-80238-TLS**

)

) **CHAPTER 13**

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Debtor.

TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

COMES NOW, KATHLEEN A. LAUGHLIN, Chapter 13 Trustee, and objects to confirmation of the plan pursuant to 11 U.S.C. § 1324 and Neb. R. Bankr. P. 3015-2(D) for the following reason(s):

1. It appears the Debtor owes a domestic support obligation. However, the amended plan does not provide treatment for a domestic support obligation.
2. It appears there is an error regarding the pre-confirmation interest rate provided to First Nebraska Credit in Part 6(B)(2) of the amended plan. Based on the amount of interest to be paid, the amended plan is underfunded.
3. The Trustee is unable to determine if the Debtor is devoting all available income to his plan. When the case was filed, the calculation on Schedule I included an improper deduction. The Debtor has since filed three Responses stating the Debtor will provide updated pay advices to the Trustee and the Debtor will file Amended Schedule I. However, as of the filing of this Objection, the Trustee has still not received updated pay advices and Amended Schedule I has still not been filed. Further information regarding the income of the Debtor will be necessary.
4. Neb. R. Bankr. P. 3015-2(G) requires an employer deduction unless the Court authorizes direct payments. At this time, no motion for direct pay has been filed.

WHEREFORE, Trustee prays that the Trustee's Objection to Confirmation be sustained.

DATED: February 5, 2021

s/ Kathleen A. Laughlin
Kathleen A. Laughlin #16883
Chapter 13 Trustee
13930 Gold Circle, Suite #201
Omaha, NE 68144
(402) 697-0437
1-800-884-0437

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the Trustee's Objection was served on CARRIE DOLL, debtor attorney, via the CM/ECF system of the United States Bankruptcy Court and a copy was mailed on February 5, 2021, by first-class, U.S. mail, postage prepaid to the Debtor at the address listed below:

WILLIAM RAYMOND BRYAN
916 CREST RD
PAPILLION, NE 68046

s/ Kathleen A. Laughlin
Kathleen A. Laughlin